DUKE POWER COMPANY
POWER BUILDING
422 SOUTH CHURCH STREET, CHARLOTTE, N. C. 28242

WILLIAM O. PARKER, JR.
VICE PRESIDENT
STEAM PRODUCTION

July 24, 1981

TELEPHONE: AREA 704
373-4083

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Mr. J. F. Stolz, Chief
Operating Reactors Branch No. 4

Re: Oconee Nuclear Station
Docket Nos. 50-269, -270, -287

Dear Sir:

Duke Power Company has reviewed the technical report provided by the Staff's letter of April 24, 1981 concerning low temperature overpressure protection at Oconee Nuclear Station. Duke disagrees with the Staff evaluation and recommendations because they are based on the incorrect assumption that the postulated event can be initiated by a failure of the injection valve to remain closed. The report states:

> Since the discharge of an HPI pump is isolated from the reactor coolant system by a single injection valve, a single error or equipment failure could open the injection valve and over-pressurize the reactor coolant system (RCS).

The Staff assumption that a valve which has been closed, power removed, and tagged closed can become, by a single error, the initiating event is contrary to the Staff position expressed in Branch Technical Position TCSB 18(PSB) "Application of the Single Failure Criterion to Manually - Controlled Electrically Operated Valves." This position states:

> Where it is determined that failure of an electrical system component can cause undesired mechanical motion of a valve or other fluid system component and this motion results in loss of the system safety function, it is acceptable, in lieu of design changes that also may be acceptable, to disconnect power to the electric systems of the valve or other fluid system component.

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Furthermore, the actions taken to prevent the inadvertent opening of the injection valve are wholly consistent with Criterion XIV, "Inspection Test, and Operating Status," of Appendix B to 10 CFR Part 50. "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprecessing Plants," which requires that measures be established for indicating the operating status of structures, systems, and components of the nuclear power plant, such as by tagging valves and switches, to prevent inadvertent operation. The Staff report in Section 3.1.4, Procedural Precautions describes the methods by which the Staff position is met.

The Staff letter also provides the position that "administrative controls shall appear in the Technical Specification as Limiting Conditions for Operation when administrative controls are used to limit overpressurization scenarios." Duke considers the inclusion of such controls in the Oconee Technical Specifications as completely unnecessary. Existing Oconee Technical Specification 6.4 requires that

> " the station be operated and maintained in accordance with approved procedures. Written procedures with appropriate check-off lists and instruction shall be provided for... normal startup, operation, and shutdown of the complete facility and of all systems and components involving nuclear safety of the facility."

One of the Oconee Operating Procedures implemented by this Specification is OP/1,2,3/A/1102/10, Controlling Procedure for Unit Shutdown. A unit shutdown is a controlled evolution with primary coolant pressures and temperatures being closely monitored during the evolution. Many operator actions are required during the shutdown to remove systems from service or to place certain systems into operation. Because of the close control of the shutdown by the operator, it is not considered that any plant modifications are necessary to inform the operator that the low temperature overpressure protection system must be made operable. Further, because these conditions are fully covered by the existing shutdown procedure, it is considered unnecessary to add these same requirements to the Technical Specifications. In view of the limited period of time that the HPI pump operates with the RCS at a low temperature, it is extremely unlikely that the event will occur.

Based on the above discussions, it is considered that the design and operation of Oconee is consistent with the established Staff position, and that no modifications to either the plant design or operation is deemed necessary.

Very truly yours,

William O. Parker, Jr.

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